



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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86 Chambers Street  
New York, New York 10007

May 25, 2022

**VIA ECF**

Hon. Ronnie Abrams  
United States District Judge  
United States District Court  
40 Foley Square  
New York, New York 10007

**Re: *El Harmaoui v. Garland, et al.*, No. 22 Civ. 509 (RA)**

Dear Judge Abrams:

This Office represents the government in this action in which the plaintiff seeks *de novo* judicial review of the denial of his application for naturalization. I write respectfully, with the plaintiff's consent, to request that the initial conference currently scheduled for June 2, 2022, be adjourned until at least two weeks after the government responds to the amended complaint, *i.e.*, adjourned to June 27, 2022, or later. I also request that the corresponding deadline for the pre-conference submission, which is currently due by May 26, 2022, be extended until one week before the rescheduled conference.

On May 9, 2022, the government filed a partial motion to dismiss. *See* ECF Nos. 19-20. In response to the motion to dismiss, the plaintiff filed a notice of intent to amend the complaint by May 30, 2022, which the Court endorsed. *See* ECF Nos. 21-22. After the plaintiff amends the complaint, the government will respond within the time allotted under the rules. I therefore request the conference adjournment to allow the plaintiff time to file his amended complaint, the government time to respond to the amended complaint, and the parties time to confer and submit any required submissions prior to any conference. An adjournment of the conference would be in the interests of efficiency and conservation of judicial and party resources given the anticipated amended complaint.

This is the government's second request to adjourn the initial conference; the Court granted the prior request. *See* ECF No. 16. The plaintiff consents to this request.

I thank the Court for its consideration of this request.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

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cc: Counsel of record (via ECF)

Application granted. The conference presently scheduled for June 2, 2022 is hereby adjourned to June 30, 2022 at 4:30 p.m.

SO ORDERED.



Hon. Ronnie Abrams  
5/26/22